

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION

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Plaintiff

*

and

*

KATHY C. KOCH

*

Intervenor/Plaintiff

*

v.

Civil No. S-02-CV-648

*

LA WEIGHT LOSS

*

Defendant

* * * * *

MOTION TO COMPEL DISCOVERY
(Answers Received But Not Satisfactory)

A motion to compel discovery was served on LA Weight Loss by Kathy Koch. The motion is attached to the notice of service of motion to compel discovery filed in this case as Paper No. 36, September 16, 2003. A response was served and is attached to the notice of service of response to motion to compel discovery filed in this case as Paper No. 42, November 13, 2003. A reply was served and is attached to the notice of service of reply to response filed in this case as Paper No. 52, January 13, 2004.

Counsel have conferred and have been unable to resolve the following issues raised in the motion to compel: Inadequate Interrogatory Answers 6, 7, 9, 14, 15, 17 and failure to produce documents responsive to Document Requests 7, 8, 12, 21, 24, 25, 26.

Koch essentially seeks (a) precise descriptions of LA Weight Loss policies, practices and procedures for lodging and investigating employee complaints of discrimination and retaliation during the relevant period; (b) actual complaints during the relevant period, and; (c) relevant “training” program material and identification of participants.

These issues are addressed in detail in the Reply Memorandum at pages 1-29, in the Memorandum of Support of Motion to Compel at pages 1-9, and in the Defendant’s response at pages 11-13, 15-25, 27-33, 35-41.

A certificate of compliance with Local Rule 104.7 is attached hereto.

Wherefore, it is requested that the court review the motion to compel, response and reply and rule on the issues set forth above.



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Dated: February 25, 2004